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Attorneys for Defendant  
JAMES O'KEEFE III

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

JUAN CARLOS VERA

Plaintiff,

v.

JAMES O'KEEFE III, an individual  
HANNAH GILES, an individual, and  
DOES 1-20 inclusive,

Defendants.

Case No. CV 10-1422-L(MDD)  
Hon. M. James Lorenz

**NOTICE OF JOINDER OF  
DEFENDANT JAMES O'KEEFE III  
TO MEMORANDUM OF POINTS  
AND AUTHORITIES IN SUPPORT  
OF DEFENDANT HANNAH  
GILES'S MOTION FOR  
SUMMARY JUDGMENT**

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that defendant James O'Keefe III hereby joins in the  
3 Memorandum of Points and Authorities in support of Defendant Hannah Giles's Motion for  
4 Summary Judgment, filed by Defendant Hannah Giles on May 7, 2012, and relies upon the facts  
5 and legal authority set forth in said motion.

6 Mr. O'Keefe will not burden the Court with a separate pleading as we concur with the  
7 recitation of the facts and law in Defendant Hannah Giles's motion.

8  
9  
10 Dated: May 7, 2012

Respectfully submitted,  
ORRICK, HERRINGTON & SUTCLIFFE  
LLP

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13 By /s/ Michael Madigan

14 Attorney for Defendant JAMES O'KEEFE III  
15 Email: mmadigan@orrick.com  
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**DECLARATION AND CERTIFICATE OF SERVICE**

I, Michael Madigan, hereby declare as follows:

I am over the age of 18 years and not a party to this action. I am employed with Orrick, Herrington & Sutcliffe, LLP, in Washington, District of Columbia. My business address is 1152 15th Street, N.W., Washington, D.C., 20005.

On May 7, 2012, I served the following document:

**1. NOTICE OF JOINDER OF DEFENDANT JAMES O'KEEFE III  
TO MEMORANDUM OF POINTS AND AUTHORITIES IN  
SUPPORT OF DEFENDANT HANNAH GILES'S MOTION FOR  
SUMMARY JUDGMENT**

(By **ELECTRONIC FILING**) I served the above referenced document by E-filing in accordance with the rules governing the electronic filing of documents in the United States District Court for the Southern District of California, which will send notification of such filing to the interested parties:

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11 **Attorney for Defendant Hannah Giles**

12  
13 I declare under the penalty of perjury under the laws of the District of  
14 Columbia that the foregoing is true and correct. Executed on May 7, 2012, in the  
15 District of Columbia.  
16

17  
18 /s/ Michael Madigan

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20 III  
21 Email: mmadigan@orrick.com  
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